

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, : Case No. 19 Cr. 366 (LGS)

- against - : **NOTICE OF MOTION**

STEPHEN M. CALK, :
Defendant. :
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PLEASE TAKE NOTICE that upon the Declaration of Paul H. Schoeman, Esq., dated April 13, 2020, the accompanying Memorandum of Law, and all prior papers and proceedings in this action, the defendant Stephen M. Calk, by his undersigned attorneys, will move this Court before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse for the Southern District of New York, at a date and time to be determined by the Court, for an order compelling the government (i) to identify its anticipated trial exhibits, any *Brady* material, and trial witnesses; and (ii) to certify to the Court that its discovery production is now complete, and for any other relief as the Court may deem just and proper.

Defendant respectfully requests oral argument in connection with this motion.

Dated: New York, New York
April 13, 2020

Respectfully submitted,

KRAMER LEVIN NAFTALIS & FRANKEL LLP

By: /s/ Paul H. Schoeman

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